

EXHIBIT 4

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
 Case No. 4:23-cv-06663

**PLAINTIFF RICHARD KADREY'S
 AMENDED RESPONSES TO
 DEFENDANT META PLATFORMS,
 INC.'S SECOND SET OF REQUESTS FOR
 ADMISSION**

Lead Case No. 3:23-cv-03417-VC

PLAINTIFF RICHARD KADREY'S AMENDED RESPONSES TO DEFENDANT META PLATFORMS, INC.'S
 SECOND SET OF REQUESTS FOR ADMISSION

1 **REQUEST FOR ADMISSION NO. 33:**

2 Admit that for a fee, YOU are willing to allow a THIRD PARTY to use YOUR ASSERTED
3 works for the purpose of training an artificial intelligence large language model.

4 **AMENDED RESPONSE TO REQUEST NO. 33:**

5 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
6 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
7 includes any person asked, hired, retained, or contracted to assist Plaintiff. As narrowed by the parties,
8 Plaintiff will construe “You” and “Your” to include Plaintiff individually, and his agents. Plaintiff
9 further objects to the phrase “for a fee” as vague and ambiguous. Subject to and without waiving the
10 foregoing objections, Plaintiff responds, admit.

Dated: August 28, 2024

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
 Case No. 4:23-cv-06663

**PLAINTIFF SARAH SILVERMAN'S
 AMENDED RESPONSES TO
 DEFENDANT META PLATFORMS,
 INC.'S SECOND SET OF REQUESTS FOR
 ADMISSION**

Lead Case No. 3:23-cv-03417-VC

PLAINTIFF SARAH SILVERMAN'S AMENDED RESPONSES TO DEFENDANT META PLATFORMS, INC.'S
 SECOND SET OF REQUESTS FOR ADMISSION

1 **REQUEST FOR ADMISSION NO. 33:**

2 Admit that for a fee, YOU are willing to allow a THIRD PARTY to use YOUR ASSERTED
3 works for the purpose of training an artificial intelligence large language model.

4 **AMENDED RESPONSE TO REQUEST NO. 33:**

5 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
6 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
7 includes any person asked, hired, retained, or contracted to assist Plaintiff. As narrowed by the parties,
8 Plaintiff will construe “You” and “Your” to include Plaintiff individually, and her agents. Plaintiff
9 further objects to the phrase “for a fee” as vague and ambiguous. Subject to and without waiving the
10 foregoing objections, Plaintiff responds, admit.

Dated: August 28, 2024

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
 Case No. 4:23-cv-06663

**PLAINTIFF JUNOT DIAZ'S AMENDED
 RESPONSES TO DEFENDANT META
 PLATFORMS, INC.'S SECOND SET OF
 REQUESTS FOR ADMISSION**

Lead Case No. 3:23-cv-03417-VC

PLAINTIFF JUNOT DIAZ'S AMENDED RESPONSES TO DEFENDANT META PLATFORMS, INC.'S SECOND SET
 OF REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 33:

Admit that for a fee, YOU are willing to allow a THIRD PARTY to use YOUR ASSERTED works for the purpose of training an artificial intelligence large language model.

AMENDED RESPONSE TO REQUEST NO. 33:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. As narrowed by the parties, Plaintiff will construe “You” and “Your” to include Plaintiff individually, and his agents. Plaintiff further objects that this Request poses an incomplete hypothetical, preventing Plaintiff from providing a single definitive answer. Subject to and without waiving the foregoing objections, Plaintiff admits only that he may be willing to consider permitting a third party to use his asserted works for the purpose of training an artificial intelligence large language model, under certain circumstances not present in this case. Plaintiff otherwise denies Request No. 33.

Dated: September 6, 2024

By: /s/ Bryan L. Clobes

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,
Individual and Representative Plaintiffs,
 v.
 Meta Platforms, Inc.,
Defendant.

Lead Case No. 3:23-cv-03417-VC
 Case No. 4:23-cv-06663

**PLAINTIFF ANDREW SEAN GREER'S
 AMENDED RESPONSES TO DEFENDANT
 META PLATFORMS, INC.'S SECOND SET
 OF REQUESTS FOR ADMISSION**

Lead Case No. 3:23-cv-03417-VC

PLAINTIFF ANDREW SEAN GREER'S AMENDED RESPONSES TO DEFENDANT META PLATFORMS, INC.'S
 SECOND SET OF REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 33:

Admit that for a fee, YOU are willing to allow a THIRD PARTY to use YOUR ASSERTED works for the purpose of training an artificial intelligence large language model.

AMENDED RESPONSE TO REQUEST NO. 33:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. As narrowed by the parties, Plaintiff will construe “You” and “Your” to include Plaintiff individually, and his agents. Plaintiff further objects that this Request poses an incomplete hypothetical, preventing Plaintiff from providing a single definitive answer. Subject to and without waiving the foregoing objections, Plaintiff admits only that he may be willing to consider permitting a third party to use his asserted works for the purpose of training an artificial intelligence large language model, under certain circumstances not present in this case. Plaintiff otherwise denies Request No. 33.

Dated: September 6, 2024

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Bryan L. Clobes

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 Plaintiffs and the Proposed Class*

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
 Case No. 4:23-cv-06663

**PLAINTIFF DAVID HENRY HWANG'S
 AMENDED RESPONSES TO DEFENDANT
 META PLATFORMS, INC.'S SECOND SET
 OF REQUESTS FOR ADMISSION**

Lead Case No. 3:23-cv-03417-VC

PLAINTIFF DAVID HENRY HWANG'S AMENDED RESPONSES TO DEFENDANT META PLATFORMS, INC.'S
 SECOND SET OF REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 33:

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AMENDED RESPONSE TO REQUEST NO. 33:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. As narrowed by the parties, Plaintiff will construe “You” and “Your” to include Plaintiff individually, and his agents. Plaintiff further objects that this Request poses an incomplete hypothetical, preventing Plaintiff from providing a single definitive answer. Subject to and without waiving the foregoing objections, Plaintiff admits only that he may be willing to consider permitting a third party to use his asserted works for the purpose of training an artificial intelligence large language model, under certain circumstances not present in this case. Plaintiff otherwise denies Request No. 33.

Dated: September 6, 2024

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 Plaintiffs and the Proposed Class*

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 NORTHERN DISTRICT OF CALIFORNIA
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Individual and Representative Plaintiffs,
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Defendant.

Lead Case No. 3:23-cv-03417-VC
 Case No. 4:23-cv-06663

**PLAINTIFF MATTHEW KLAM'S
 AMENDED RESPONSES TO DEFENDANT
 META PLATFORMS, INC.'S SECOND SET
 OF REQUESTS FOR ADMISSION**

Lead Case No. 3:23-cv-03417-VC

PLAINTIFF MATTHEW KLAM'S AMENDED RESPONSES TO DEFENDANT META PLATFORMS, INC.'S
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Admit that for a fee, YOU are willing to allow a THIRD PARTY to use YOUR ASSERTED works for the purpose of training an artificial intelligence large language model.

AMENDED RESPONSE TO REQUEST NO. 33:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. As narrowed by the parties, Plaintiff will construe “You” and “Your” to include Plaintiff individually, and his agents. Plaintiff further objects that this Request poses an incomplete hypothetical, preventing Plaintiff from providing a single definitive answer. Subject to and without waiving the foregoing objections, Plaintiff admits only that he may be willing to consider permitting a third party to use his asserted works for the purpose of training an artificial intelligence large language model, under certain circumstances not present in this case. Plaintiff otherwise denies Request No. 33.

Dated: September 6, 2024

By: /s/ Bryan L. Clobes
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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,
Individual and Representative Plaintiffs,
 v.
 Meta Platforms, Inc.,
Defendant.

Lead Case No. 3:23-cv-03417-VC
 Case No. 4:23-cv-06663

**PLAINTIFF LAURA LIPPMAN'S
 AMENDED RESPONSES TO DEFENDANT
 META PLATFORMS, INC.'S SECOND SET
 OF REQUESTS FOR ADMISSION**

Lead Case No. 3:23-cv-03417-VC

PLAINTIFF LAURA LIPPMAN'S AMENDED RESPONSES TO DEFENDANT META PLATFORMS, INC.'S
 SECOND SET OF REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 33:

Admit that for a fee, YOU are willing to allow a THIRD PARTY to use YOUR ASSERTED works for the purpose of training an artificial intelligence large language model.

AMENDED RESPONSE TO REQUEST NO. 33:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. As narrowed by the parties, Plaintiff will construe “You” and “Your” to include Plaintiff individually, and her agents. Plaintiff further objects that this Request poses an incomplete hypothetical, preventing Plaintiff from providing a single definitive answer. Subject to and without waiving the foregoing objections, Plaintiff admits only that she may be willing to consider permitting a third party to use her asserted works for the purpose of training an artificial intelligence large language model, under certain circumstances not present in this case. Plaintiff otherwise denies Request No. 33.

Dated: September 6, 2024

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
 Case No. 4:23-cv-06663

**PLAINTIFF RACHEL LOUISE SNYDER'S
 AMENDED RESPONSES TO DEFENDANT
 META PLATFORMS, INC.'S SECOND SET
 OF REQUESTS FOR ADMISSION**

Lead Case No. 3:23-cv-03417-VC

PLAINTIFF RACHEL LOUISE SNYDER'S AMENDED RESPONSES TO DEFENDANT META PLATFORMS, INC.'S
 SECOND SET OF REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 33:

Admit that for a fee, YOU are willing to allow a THIRD PARTY to use YOUR ASSERTED works for the purpose of training an artificial intelligence large language model.

AMENDED RESPONSE TO REQUEST NO. 33:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. As narrowed by the parties, Plaintiff will construe “You” and “Your” to include Plaintiff individually, and her agents. Plaintiff further objects that this Request poses an incomplete hypothetical, preventing Plaintiff from providing a single definitive answer. Subject to and without waiving the foregoing objections, Plaintiff admits only that she may be willing to consider permitting a third party to use her asserted works for the purpose of training an artificial intelligence large language model, under certain circumstances not present in this case. Plaintiff otherwise denies Request No. 33.

Dated: September 6, 2024

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
 Case No. 4:23-cv-06663

**PLAINTIFF JACQUELINE WOODSON'S
 AMENDED RESPONSES TO DEFENDANT
 META PLATFORMS, INC.'S SECOND SET
 OF REQUESTS FOR ADMISSION**

Lead Case No. 3:23-cv-03417-VC

PLAINTIFF JACQUELINE WOODSON'S AMENDED RESPONSES TO DEFENDANT META PLATFORMS, INC.'S
 SECOND SET OF REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 33:

Admit that for a fee, YOU are willing to allow a THIRD PARTY to use YOUR ASSERTED works for the purpose of training an artificial intelligence large language model.

AMENDED RESPONSE TO REQUEST NO. 33:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. As narrowed by the parties, Plaintiff will construe “You” and “Your” to include Plaintiff individually, and her agents. Plaintiff further objects that this Request poses an incomplete hypothetical, preventing Plaintiff from providing a single definitive answer. Subject to and without waiving the foregoing objections, Plaintiff admits only that she may be willing to consider permitting a third party to use her asserted works for the purpose of training an artificial intelligence large language model, under certain circumstances not present in this case. Plaintiff otherwise denies Request No. 33.

Dated: September 6, 2024

By: /s/ Bryan L. Clobes
Bryan L. Clobes

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COATES, JUNOT DÍAZ, ANDREW SEAN
GREER, DAVID HENRY HWANG,
MATTHEW KLAM, LAURA LIPPMAN,
RACHEL LOUISE SNYDER, JACQUELINE
WOODSON, AND LYSA TERKEURST,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.;

Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFF LYSA TERKEURST'S
SUPPLEMENTAL RESPONSES AND
OBJECTIONS TO DEFENDANT META
PLATFORMS, INC.'S SECOND SET OF
REQUESTS FOR ADMISSION**

Plaintiff Lysa TerKeurst ("Plaintiff") hereby amends her responses to Defendant Meta Platforms, Inc.'s ("Defendant" or "Meta") Second Set of Requests for Admissions (the "Requests" or "RFAs").

GENERAL OBJECTIONS

1. Plaintiff generally objects to Defendant's definitions and instructions to the extent they purport to require Plaintiff to respond in any way beyond what is required by the Federal and local rules.

2. Plaintiff objects to the Requests to the extent they seek information or materials that are protected from disclosure by attorney-client privilege, the work product doctrine, expert

1 limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to this
 2 Request because it is hypothetical and is not tied to the facts of the case. *See, e.g., Buchanan v.*
 3 *Chi. Transit Auth.*, 2016 WL 7116591, at *5 (N.D. Ill. Dec. 7, 2016) (“Since requests to admit
 4 ‘must be connected to the facts of the case, courts do not permit “hypothetical” questions within
 5 requests for admission.”); *Fulhorst v. Un. Techs. Auto., Inc.*, 1997 WL 873548, at *3 (D. Del.
 6 Nov. 17, 1997) (denying request “asking Plaintiff to admit to infringement in the context of the
 7 hypothetical use of its device”); Fed. R. Civ. P. 36 advisory committee’s note to 1946 amendment.
 8 There is no way for Plaintiff to know what her licensing opportunities would have been but for
 9 Meta’s failure to compensate, let alone other LLM developers. Subject to and without waiving the
 10 foregoing objections, Plaintiff admits that Plaintiff is currently unaware of any documentary
 11 evidence that she has lost a specific licensing opportunity due to the infringement alleged in the
 12 COMPLAINT, but denies that her lack of awareness has any bearing on whether any licensing
 13 opportunities were lost due to the infringement alleged in the COMPLAINT or whether
 14 documentary evidence of the same exists.

15 **REQUEST FOR ADMISSION NO. 33:**

16 Admit that for a fee, YOU are willing to allow a THIRD PARTY to use YOUR
 17 ASSERTED works for the purpose of training an artificial intelligence large language model.

18 **RESPONSE TO REQUEST NO. 33:**

19 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling
 20 for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined,
 21 it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe
 22 the terms “You” and “Your” as referring to Plaintiff Lysa TerKeurst. Plaintiff further objects to
 23 the phrase “for a fee” as vague and ambiguous. Plaintiff further objects that Request No. 33 poses
 24 an incomplete hypothetical, making a single definitive answer impossible. Subject to and without
 25 waiving the foregoing objections, Plaintiff admits only that she may be willing to consider
 26 permitting a third party to use her asserted works for the purpose of training an artificial

intelligence large language model, for a fee, under certain circumstances. Plaintiff otherwise denies Request No. 33.

SUPPLEMENTAL RESPONSE TO REQUEST NO. 33:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Lysa TerKeurst and her agent, Meredith Brock. Plaintiff further objects to the phrase “for a fee” as vague and ambiguous. Plaintiff further objects that Request No. 33 poses an incomplete hypothetical, making a single definitive answer impossible. Subject to and without waiving the foregoing objections, Plaintiff admits only that she may be willing to consider permitting a third party to use her asserted works for the purpose of training an artificial intelligence large language model, for a fee, under certain circumstances. Plaintiff otherwise denies Request No. 33.

Dated: September 12, 2024

By: /s/ James A. Ulwick

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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,
 Individual and Representative
 Plaintiffs,

Case No. 3:23-cv-03417-VC

PLAINTIFF CHRISTOPHER
 FARNSWORTH'S RESPONSES TO
 DEFENDANT'S FIRST SET OF REQUESTS
 FOR ADMISSIONS

PLAINTIFF CHRISTOPHER FARNSWORTH'S
 RESPONSES TO RFA'S, SET 1
 No. 3:23-CV-03417-VC

RESPONSE TO REQUEST FOR ADMISSION NO. 32

Plaintiff objects to the terms “contributed” and “literary content” are vague and unintelligible.

Subject to and without waiving these general and specific objections, will not respond to this Request, as it is unintelligible. If a response is deemed required, Plaintiff denies the Request on this same basis.

REQUEST FOR ADMISSION NO. 33:

Admit that YOU have never offered to license or sell any of YOUR ASSERTED WORKS for use in the training of an artificial intelligence large language model.

RESPONSE TO REQUEST FOR ADMISSION NO. 33:

Plaintiff objects that the term “artificial intelligence” is vague and ambiguous. Plaintiff further objects to this Request as duplicative in whole or in part of Requests Nos. 8–11.

Subject to and without waiving these general and specific objections, Plaintiff admits that neither Meta nor any other entity gathering training data for generative artificial intelligence has asked to license or purchase any of Plaintiff’s Asserted Works, and so, further responding, Plaintiff admits Request for Production No. 33.

REQUEST FOR ADMISSION NO. 34:

Admit that YOUR publisher has the ability, on your behalf, to license YOUR ASSERTED WORKS to THIRD PARTIES.

RESPONSE TO REQUEST FOR ADMISSION NO. 34:

Plaintiff objects to this Request to the extent that Defendant has access to Plaintiff’s publishing agreements and can review the publishing agreements for any such terms giving a publisher the ability to licensing Asserted Works to Third Parties.

Subject to and without waiving these general and specific objections, Plaintiff thus directs Defendant to the already produced publishing agreements. If a response is deemed required, Plaintiff denies the Request on this same basis.

REQUEST FOR ADMISSION NO. 35:

Admit that for a fee, YOU are willing to allow a THIRD PARTY to use YOUR

1 ASSERTED works for the purpose of training an artificial intelligence large language model.

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 35:**

3 Plaintiff further objects that the term “for a fee” is vague and ambiguous. Plaintiff further
4 objects that this Request poses an incomplete hypothetical, making a single definitive answer
5 impossible.

6 Subject to and without waiving these general and specific objections, Plaintiff admits only
7 that he may be willing to consider permitting a Third Party to use his asserted works for the
8 purpose of training an artificial intelligence large language model, for a fee, under certain
9 circumstances. Plaintiff otherwise denies Request No. 33.

10 **REQUEST FOR ADMISSION NO. 36:**

11 Admit that portions of YOUR book entitled Blood Oath are available to read for free on
12 Google Books.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 36:**

14 Plaintiff objects to this Request as improper and unduly burdensome because it seeks
15 information beyond the scope of the parties’ claims and defenses in this case, and falls outside of
16 allowable discovery under Fed. R. Civ. P. 26(b)(1). Plaintiff further objects to this Request as an
17 improper use of requests for admissions under Federal Rule 36 because it reflects an attempt by
18 Meta to gather evidence regarding a new topic and non-defendant, rather than an effort to narrow
19 the issues for trial. “The goal of Requests for Admission is to eliminate from the trial issues as to
20 which there is no genuine dispute and, therefore, Requests for Admissions are not intended to be
21 used as means of gathering evidence.” *Bovarie v. Schwarzenegger*, No. 08CV1661 LAB NLS,
22 2011 WL 719206, at *6 (S.D. Cal. Feb. 22, 2011) (citing *Google Inc. v. American Blind &*
23 *Wallpaper Factory, Inc.*, 2006 WL 2578277 (N.D. Cal. Sept. 6, 2006)). To discover new
24 information, parties must use other methods, like depositions, document requests, or
25 interrogatories. *See, e.g., Republic of Turkey v. Christie’s, Inc.*, 326 F.R.D. 394, 399 (S.D.N.Y.
26 2018) (explaining that “[w]hile the basic purpose of discovery is to elicit facts and information
27 and to obtain production of documents, Rule 36 was not designed for this purpose”) (quoting 7
28 Moore’s Federal Practice § 36.02[1]); *Spectrum Dynamics Med. Ltd. V. Gen. Elec. Co.*,

REQUEST FOR ADMISSION NO. 81:

Admit that you are not aware of any agreements to assign rights in or to YOUR ASSERTED WORK(S) that have not already been produced in this ACTION.

RESPONSE TO REQUEST FOR ADMISSION NO. 81:

Plaintiff objects that the terms “any agreements” and “assign rights in or to” are vague and ambiguous. Plaintiff further objects to this Request as compound and ambiguous, because it includes the disjunctive phrase, “in or to.” “[R]equests for admissions should not contain ‘compound, conjunctive, or disjunctive ... statements.’” *James v. Maguire Corr. Facility*, No. C 10-1795 SI PR, 2012 WL 3939343, at *4 (N.D. Cal. Sept. 10, 2012) (*quoting U.S. ex rel. England v. Los Angeles County*, 235 F.R.D. 675, 684 (E.D. Cal. 2006)); *see also King v. Biter*, No. 115CV00414LJOSABPC, 2018 WL 339052, at *6 (E.D. Cal. Jan. 9, 2018).

Subject to and without waiving these general and specific objections, Plaintiff admits discovery is ongoing. Plaintiff further admits that Plaintiff has produced non-privileged documents in Plaintiff’s possession, custody, or control, responsive to Meta’s requests for production regarding licensing agreements for Plaintiff’s Asserted Works. Plaintiff otherwise denies this Request.

Dated: November 18, 2024

Respectfully submitted,

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By: /s/ Rachel Geman

Rachel Geman

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